

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

Ronald Schmidt,

Plaintiff,

v.

Hand's On CDL Driving School, Inc.,

Defendant.

**DEFENDANT'S NOTICE OF
MOTION AND MOTION FOR
SUMMARY JUDGMENT**

Case No. 20-CV-999

TO: Ronald Schmidt
c/o Kurt C. Kobelt
Law Offices of Kurt C. Kobelt
7120 Caneel Trail
Middleton, WI 53562

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 56, Defendant, Hand's On CDL Driving School, Inc., moves the Court for an order granting summary judgment against plaintiff and dismissing plaintiff's complaint.

Summary judgment is proper because there are no genuine disputes of material fact and because Defendant is entitled to judgment as a matter of law.

This motion is based on Defendant's Brief in Support of Motion for Summary Judgment, Defendant's Proposed Findings of Fact, and the declarations of Brooke Smith, Bill Dekarske and Peter Reinhardt.

Dated: 11/5/2021

BAKKE NORMAN, S.C.

By: 

Peter M. Reinhardt
Attorney No. 1025187
2919 Schneider Avenue SE, P.O. Box 280
Menomonie, WI 54751-0280
(715) 235-9016
preinhardt@bakkenorman.com
Attorneys for Defendant